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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ROBERT COSSABOON and : CHAPTER 13

CHARLOTTE COSSABOON

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DEBTOR : CASE NO. 16- 11795 MDC

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## MOTION TO CONVERT A CASE UNDER CHAPTER 13 TO A CASE UNDER CHAPTER 7

Pursuant to 11 U.S.C. § 1307(a), the above-named Debtors, by their counsel, request that this court enter an Order converting this case under Chapter 13 to a case under Chapter 7 of the Bankruptcy code (title 11 of the United States Code), on the grounds set forth below.

- 1. On March 16th, 2016, the above-named Debtor(s) filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code.
- 2. This case has not been previously converted.

WHEREFORE, Debtor(s) prays for an Order converting this case under Chapter 13 to Chapter 7 of the Bankruptcy Code.

Respectfully:

Joseph F. Claffy /s/ Joseph F. Claffy, Esquire Attorney for Debtor 26 South Church Street West Chester, PA 19382 610 429-0900/ 9550 FAX ID 35142 claffylaw@aol.com